Pursuant to the Foreign Agents Registration Act of 1938, as amended

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the Administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently.

and for EACH additional foreign pri	incipal acquired subsequently.	
1. Name and address of registrant		2. Registration No.
Yablonski, Both, & Edelman 1140 Connecticut Ave. NW Suite 80 Washington, DC 20036	0	544
3. Name of foreign principal	4. Principal address of foreign pri	ncipal
The Kazakhstan 21st Century Foundation	OBT Treuhand AG Weinberg strass P.O. Box 8042	
5. Indicate whether your foreign principal is one of the following:		
☐ Foreign government		
☐ Foreign political party		
Foreign or domestic organization: If either, check one of the	he following:	
☐ Partnership	☐ Committee	
☐ Corporation	☐ Voluntary group	
★ Association	☐ Other (specify)	<u> </u>
☐ Individual-State nationality		
5. If the foreign principal is a foreign government, state:		
a) Branch or agency represented by the registrant.	I	유
b) Name and title of official with whom registrant deals.		
7. If the foreign principal is a foreign political party, state:	7 / 7	
a) Principal address.	N/A	10 (10 ft) 10 (10 ft) 10 (10 ft)
b) Name and title of official with whom registrant deals.		
c) Principal aim		
		en e

and

reign government or a foreign political party,			
lst Century Foundation is a non-prof.	it forum to suppor		
vernment, foreign political party, or other foreign principal	Yes □ No 🖫		
Owned by a foreign government, foreign political party, or other foreign principal Directed by a foreign government, foreign political party, or other foreign principal Controlled by a foreign government, foreign political party, or other foreign principal			
		rnment, foreign political party, or other foreign principal	Yes□ No 🖟
		ign government, foreign political party, or other foreign principal	Yes □ No 🞝
Yes" in Item 8(b). (If additional space is needed, a full insert pag	e must be used.)		
unization and is not owned or controlled by a foreign government, for o owns and controls it.	oreign political party or		
	ed entity nor		
Name and Title Signature			
Charles R. Both Attorney			
	rement, foreign political party, or other foreign principal rement, foreign political party, or other foreign principal rement, foreign political party, or other foreign principal rign government, foreign political party, or other foreign principal rign government, foreign political party, or other foreign principal right government, foreign political party, or other foreign principal right government, foreign government, for owns and controls it. 1 St Century Foundation is not an owney shareholders. Name and Title Charles R. Both Signature		

Pursuant to the Foreign Agents Registration Act of 1938, an amended

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. One original and two legible photocopies of this form shall be filed for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the Administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public. Finally, the Attorney General intends, at the earliest possible opportunity, to make these public documents available on the Internet on the Department of Justice World Wide Web site.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant

Yablonski, Both, & Edelman

2. Registration No.

5443

3. Name of Foreign Principal

The Kazakhstan 21st Century Foundation

Check Appropriate Boxes:

- 4.

 The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
- 5. There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- 6.

 The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
- 7. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Yablonski, Both, & Edelman has agreed to advise the Kazakhstan 21st Century Foundation on legal issues surrounding the Foundation's efforts to bring about free press and free elections in Kazakhstan.

8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Yablonksi, Both, & Edelman provides legal advice to the Foundation on legal issues surrounding the Foundations efforts to promote free press and free elections in Kazakhstan. These efforts include attendence at meetings, advice on planning, hiring of other professionals including public relations and other legal advisors and assistance in the campaign to bring world attention to problems in Kazakhstan.

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(0) of the Act and in the footnote below? Yes IX No □

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

In connection with Yablonksi, Both, & Edelman's representation of the Kazakhstan 21st Century Foundation, it is possible that the firm will make contact with and correspond with federal government officials and staff of legislators in a manner that could be arguably viewed as political activity.

Date of Exhibit B

The 21, 2001

Name and Title

Charles R. Both Attorney

Signature